

BakerHostetler

Baker&Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111

T 212.589.4200
F 212.589.4201
www.bakerlaw.com

Keith R. Murphy
direct dial: 212.589.4686
kmurphy@bakerlaw.com

July 25, 2017

VIA ECF AND ELECTRONIC MAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Room 723
New York, New York 10004-1408
Bernstein.chambers@nysb.uscourts.gov

Re: Picard v. BAM L.P., et al. (Adv. Pro. No. 10-04390 (SMB))

Dear Judge Bernstein:

We are counsel to Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* and the estate of Bernard L. Madoff.

On behalf of all parties to the proceedings referenced above, we write to respectfully request an enlargement of time to file the Joint Stipulated Statement of Undisputed Material Facts, that was previously due on May 31, 2017, and then subsequently adjourned until July 26, 2017. *See e.g.*, Letter dated May 2, 2017 (ECF No. 68); Notice of Adjournment of Hearing dated June 27, 2017 (ECF No. 69). Specifically, the parties jointly request a new deadline as of August 23, 2017. The parties will submit their Joint Stipulated Statement of Undisputed Material Facts by that date, or otherwise inform the Court of their progress.

Respectfully submitted,

/s/ Keith R. Murphy

Keith R. Murphy
Partner

cc: Carol Neville (via email)

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver
Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC